

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) Cr. No. 05-40011-FDS  
 )  
 ANDRE ROSADO )  
 Defendant. )

**JOINT INITIAL STATUS REPORT**

The United States of America and the defendant, Andre Rosado, by their respective undersigned counsel, submit this joint status report pursuant to Local Rule 116.5(A). Pursuant to this Court's Initial Scheduling Order, dated April 11, 2005, the parties submit that there is no need for an initial status conference (currently scheduled for May 23, 2005).

**1. Local Rule 116.3 Timing Requirements**

At this time the parties do not seek relief from the timing requirements imposed by L.R. 116.3.

**2. Expert Discovery**

The government anticipates that, unless there is a stipulation regarding the controlled substances involved in this case, it will offer expert testimony regarding the narcotics seized in this case. The defendant does not presently request expert discovery, but reserves its right to seek such discovery pending disclosure of trial witnesses by the government.

**3. Additional Discovery**

All Rule 16 and automatic discovery materials have been provided or made available to defendant's counsel.

**4. Motion Date**

The parties jointly request that all motions be filed on or before June 15, 2005, and any responses be served by June 22, 2005.

**5. Speedy Trial Act**

The parties have conferred on the periods excludable from all Speedy Trial Act calculations and believe that the following periods are excludable:

4/7/05-4/11/05	Arraignment and Gov't.'s motion for detention
4/11/05-4/25/05	Order for exclusion entered 4/11/05
4/26/05-5/9/05	Order for exclusion entered 4/11/05, footnote 1
5/17/05-date of Final status	Excluded as set forth above and below

As of the Final Status Conference, 7 days will have been counted and 63 days will remain under the Speedy Trial Act.

**6. Early Case Resolution**

The parties are engaged in plea discussions. The parties request that the time period from the date of this motion until the date of the Final Status conference be excluded from all calculations under the Speedy Trial Act to enable the parties to engage in continued plea discussions.

**7. Final Status Conference**

The parties request that a Final Status Conference be scheduled for June 22, 2005, or as soon thereafter as is convenient for the Court.

Respectfully submitted,

MICHAEL J. SULLIVAN

United States Attorney

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For the Defendant

/s/ STEPHEN W. WHITE  
STEPHEN W. WHITE

Dated: May 18, 2005